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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **DECLARATION OF LINDSAY COOPER
24 IN SUPPORT OF PLAINTIFF WAYMO
25 LLC'S ADMINISTRATIVE MOTION TO
26 FILE UNDER SEAL PORTIONS OF ITS
27 LETTER BRIEF IN OPPOSITION TO
28 ANTHONY LEVANDOWSKI'S MOTION
FRIEDBERG, LLC**

29 UBER TECHNOLOGIES, INC.;
30 OTTOMOTTO LLC; OTTO TRUCKING
31 LLC,

32 Defendants.

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45 CASE No. 3:17-cv-00939-WHA

46 COOPER DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO SEAL

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal portions of its Letter Brief in Opposition to Anthony Levandowski’s Motion to Quash the
 8 subpoena that Waymo served on third party Stroz Friedberg, LLC (the “Administrative Motion”).
 9 The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief in Opposition to Anthony Levandowski’s Motion to Quash the subpoena that Waymo served on third party Stroz Friedberg, LLC (the “Letter Brief”)	Highlighted in Blue	Defendants

16 3. Waymo’s Letter Brief contains references to information that Defendants have
 17 designated as confidential and/or highly confidential.

18 4. Waymo expects Defendants to file one or more declarations in accordance with the
 19 Local Rules.

21 I declare under penalty of perjury under the laws of the State of California and the United
 22 States of America that the foregoing is true and correct, and that this declaration was executed in San
 23 Francisco, California, on June 14, 2017.

24 By /s/ Lindsay Cooper
 25 Lindsay Cooper
 26 Attorney for WAYMO LLC

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3 **SIGNATURE ATTESTATION**

4 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
5 filing of this document has been obtained from Lindsay Cooper.

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7 */s/ Charles K. Verhoeven*
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Charles K. Verhoeven
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